

May 1, 2006

Ms. Debra Wolfe
Montana Department of Environmental Quality
P.O. Box 200901
Helena, Montana 59620-0901

Dear Ms. Wolfe:

Ash Grove Cement Company appreciates the opportunity to comment on the draft BART Modeling protocol. Ash Grove has reviewed the draft protocol and have the following comments for your consideration.

1. **Grid Spacing**

The Montana draft CALPUFF BART modeling protocol uses MM5 data with grid spacing of 36 km for the years 2001 and 2003 and 12 km for year 2002. The CALMET grid spacing is 6 km. It is appropriate to introduce local meteorological observations, as MDEQ has suggested in the protocol, to characterize any local terrain effects that are not adequately characterized by the MM5 data. Complex terrain is likely to be important for the relatively short source-receptor distances in the state of Montana. A finer CALMET grid spacing of 2 km may better characterize the flow fields and land use changes that occur between the relatively short (50-100 km) source-receptor distances that can occur within the Montana domain.

2. **PM10 Speciation**

The MDEQ has suggested to assume that 99% of the PM10 emissions are particulate matter less than or equal to 2.5 microns (PM2.5). The remaining 1% is considered elemental carbon (EC). However, for coal-fired power plants, MDEQ is allowing use of the National Park Service (NPS) recommendation for speciation of PM for coal-fired power plants. The MDEQ also states in their protocol that "If better speciation data becomes available before modeling is completed, the MDEQ will apply that information if time, resources, and other relevant factors permit." At this time, there is better speciation data available. In addition to coal-fired power plants, the NPS has also developed

recommendations for other sources that should be used to speciate the particulate matter into the particulate species known to affect visibility. Although not posted on their website, the NPS has developed several "workbooks" for residual-oil-fired boilers, coal thermal dryers, cement kilns, lime kilns, and combustion turbines that are being used for PSD applications and other BART modeling applications across the country. In addition to these workbooks, EPA's AP-42 provides speciation data by industry as well. In order to predict visibility impacts, the emissions data going into the model should be using the best available information, and at this time the source-specific data compiled by the NPS is the best available data. This source-specific data should be used in place of an across-the-board assumption.

Once again, Ash Grove appreciates the opportunity comment on the protocol. If you have any questions or if you need additional clarification on either of these two issues, please contact me.

Sincerely,

Robert V. Vantuyl Jr.
Ash Grove Cement Company

Cc: Joe Scheeler-Montana City plant